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**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

JANE DOE,)	Case No.: 2:18-cv-00370-RFB-GWF
)	
Plaintiff,)	STIPULATION AND (PROPOSED)
)	ORDER REGARDING
vs.)	DEPOSITIONS OF THE PARTIES
)	AND OTHERS, AND DISPOSITIVE
NATURE'S VALUE, INC., RICHARD PERSAUD,)	<u>MOTIONS DEADLINE</u>
and DOES 1 through 20,)	
)	SECOND REQUEST
Defendants.)	
)	
)	

Pursuant to Local Rules 6-1 and 7-1, Plaintiff JANE DOE, through her counsel of record, and Defendants Nature Value, Inc. and Richard Persaud ("Defendants"), through their counsel of record, hereby stipulate as follows:

STIPULATION

1. On October 23, 2018, Deverie Christensen and Joshua Sliker, counsel for Defendants, filed a Motion to Withdraw as Counsel for Defendant Persaud. ECF No. 37.
2. The Court granted the Motion to Withdraw. ECF No. 41.
3. While the Motion to Withdraw was pending with the Court, the Court issued a minute order staying discovery as to Defendant Persaud until November 23, 2018 to allow him to retain new counsel. ECF No. 38.
4. Also, while the Motion to Withdraw was pending with the Court, the parties

1 stipulated to stay all discovery recognizing that Persaud would be obtaining new counsel and the
2 new counsel would need to participate in the remaining discovery. ECF No. 39.

3 5. The Court granted the request in ECF No. 40.

4 6. Absent further extension of the stay or other relief by the Court, as part of ECF No.
5 40, the Court ordered the parties to work together and file a stipulation by November 30, 2018 that
6 would establish a schedule for completing the remaining discovery and filing dispositive motions.

7 7. On November 16, 2018, Persaud retained Robert S. Larsen of Gordon Rees Scully
8 Mansukhani, LLP as new counsel.

9 8. Counsel for the parties believe that for Persaud's new counsel, Mr. Larsen, to
10 meaningfully meet and confer on a discovery plan, additional time is required to allow Mr. Larsen
11 to obtain and review the file, discuss the claims with Mr. Persaud, and discuss the case status with
12 prior counsel.

13 9. With the Thanksgiving holiday and an upcoming travel schedule of Mr. Larsen,
14 during which he will be out of the country for one week in early December, the parties request that
15 the deadline to submit to the Court a stipulation or revised discovery plan and to seek amendments
16 to the scheduling order be extended until **December 20, 2018**.

17 10. This extension will provide counsel for the parties an opportunity to develop and
18 submit to the Court a more realistic schedule for completing the remaining discovery.

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11. This extension is requested by the parties in good faith and is not made for the purposes of delay.

DATED: November 20, 2018

GORDON REES SCULLY MANSUKHANI LLP

/s/ Robert S. Larsen

Robert S. Larsen
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DATED: November 20, 2018

JACKSON LEWIS P.C.

/s/ Joshua A. Sliker

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DATED: November 20, 2018

LAW OFFICE OF STEVEN J. PARSONS

/s/ Steven J. Parsons

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Attorney for *Jane Doe*

ORDER

IT IS SO ORDERED:


UNITED STATES MAGISTRATE JUDGE

Dated: 11/21/2018